

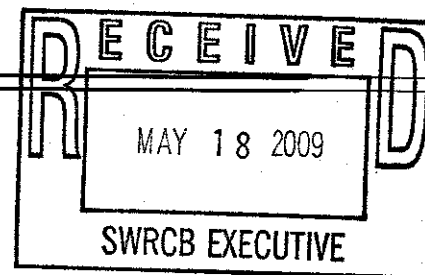
SOUTH COAST



WATER DISTRICT

May 18, 2009

Ms. Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento CA 95812-0200



Re: Comments to May 7, 2009 Revision of General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water (General Permit)

Dear Ms. Townsend:

The SCWD would like to thank the State Board for the opportunity to provide written comments and testimony on the May 7, 2009 Revisions to the General Permit.

The South Coast Water District (SCWD) is a member agency of the South Orange County Wastewater Authority (SOCWA). As the wastewater treating agency, SOCWA provides up to 17,000 acre feet of recycled water annually, which is delivered to approximately 3000 user sites across 220 square miles of service area (representing a population of 500,000). SCWD manages the recycled water usage for its service area and serves up to 900 acre feet of recycled water annually to 167 accounts located within an 8.3 square mile service area.

The SCWD, as a SOCWA member agency, supports the use and development of recycled water as an important resource. Today, 10% of SCWD's water demand is met by recycled water. SCWD has also focused its 2009 Master Plan on projects that will bring even more recycled water customers on line over the next 10 years, and SCWD is planning for growth of up to 20% recycled water as meeting water supply needs.

SCWD supports the development of a State General Permit. However, SCWD is expecting the General Permit to enhance the ability to expand recycled water use in accordance with State law and the Recycled Water Policy adopted last year. Unfortunately, the new draft policy (May 7, 2009) will, in substantial part, deter agencies from pursuing growth in recycled water use due to costs driven by dramatic changes to inspection staff and compliance reporting, and customer training, - - as now contained in the Monitoring and Reporting Program (MRP). The MRP as drafted will deter not only our current customers, but it will make it even more difficult to encourage the growth in recycled water customers that our supply concerns demand.

SCWD estimates \$500,000 in added annual costs to its recycled water program based on the required additional inspection, customer training, and reporting necessary to produce monthly documentation of Nitrogen application rates on a lbs per acre basis, including gathering quantified and verified analytical data from users as to "any other chemical or organic fertilizers applied" by the customers and conducting verification of user log book entry procedures (167 accounts x 52 [weekly reporting entries] = verification of 8684 log entries for just our 8.3 square miles of service area alone) such that accurate monthly reporting could be accomplished. Multiplying the impacts of these extensive additional program requirements over the entire

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SOCWA service area, and the program changes will produce added costs estimated at \$3,750,000 for SOCWA member agencies.

SCWD estimates 3 added FTE's to provide weekly inspection for 167 accounts, training, follow up, log verification, at a rate of over 20 sites per day.

Further, the additional documentation requirements from end users of recycled water for log book reporting of nutrient additions will require funding for training, tracking and verification procedures, and such costs will be borne by the users. In most cases, private party recycled water customers rely on private landscape contractors and it will be difficult for producers to track the level of skill, knowledge and consistency in reporting necessary to make collected data accurate and reportable. Operating cost increases will accrue to recycled water customers and to the businesses providing landscape services to them.

In addition to cost considerations, the MRP is in large part a third wheel of regulation designed to address the salt/nutrient issues already managed by the Recycled Water Policy.

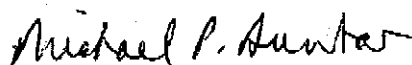
Given the layers on highly prescriptive documentation required for individual customer sites our agency would not seek coverage under this General Permit. We are very concerned with the prospect that this version of the General Permit could be used as a template by individual Regional Water Quality Control Boards to craft future Recycled Water Waste Discharge Requirements.

For the above reasons, SCWD, as a SOCWA member agency, is strongly opposed to the MRP as contained in the May 7, 2009 draft of the General Permit. Many of the prohibitions contained in the General Permit appear to be based on the premise that Best Management Practices are either not currently in place or are not effective or that recycled water is a significant contributor to the surface and groundwater problems faced by our State. The State Board has offered no rational basis for creating these onerous customer site requirements.

Please understand that while we stand ready to support a General Permit that promotes the use of recycled water and is effective in protecting the beneficial uses of the local water basins and the waters of the State, we do not support the General Permit as it is currently drafted. Thank you for the opportunity to provide these comments. If you require additional information please contact the undersigned at (949) 499-4555 or call SOCWA representative Brennon Flahive at (949) 234-5419.

Sincerely,

SOUTH COAST WATER DISTRICT



Mike Dunbar
General Manager

MD: jb